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A Limited Liability Partnership

2 Including Professional Corporations

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8
9 Attorneys for Allstate Insurance Company
(erroneously sued as "Allstate Property
and Casualty Insurance Company")

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION

12 MATTHEW POTURICH AND
13 TERESA POTURICH,

14 Plaintiffs,

15 v.

16 ALLSTATE INSURANCE
17 COMPANY, ALLSTATE PROPERTY
18 AND CASUALTY INSURANCE
19 COMPANY, and DOES 1 through 50,
inclusive,

Defendants.

Case No. 5:15-cv-00081-GW-KKx

The Hon. Kenly Kiya Kato
Courtroom 3/4 Third Floor

**DECLARATION OF CHRISTINA
DING IN SUPPORT OF
ALLSTATE'S MOTION TO
COMPEL PLAINTIFFS TO
RESPOND TO WRITTEN
DISCOVERY AND PRODUCE
DOCUMENTS AND MOTION FOR
MONETARY SANCTIONS**

Date: July 23, 2015
Time: 10:00 a.m.
Dept.: Courtroom 3/4

Complaint Filed: December 12, 2014
Trial Date: TBD

DECLARATION OF CHRISTINA DING

I, Christina Ding, declare:

1. I am an attorney with the law firm of Sheppard Mullin Richter & Hampton LLP, attorneys of record for Allstate Insurance Company in this matter. I have personal, first-hand knowledge of the following facts.

2. I submit this declaration in support of Allstate's motion to compel plaintiffs' responses to written discovery and the production of documents.

3. On April 30, 2015, my office served document requests and interrogatories on plaintiffs. The discovery sought basic information about the nature of plaintiffs' claims in the complaint. Plaintiffs' deadline to respond was June 2, 2015. Attached as Exhibit 1 is a true and correct copy of Allstate's requests for production of documents and interrogatories.

4. Having received no response from plaintiffs, I sent a letter on June 8, 2015, informing plaintiffs that they had waived objections by failing to timely respond to written discovery and requesting responses to the written discovery without objections by June 16, 2015. I further informed plaintiffs' counsel that Allstate intended to depose plaintiffs by the end of July and needed to review plaintiffs' written responses before those depositions. I invited plaintiffs' counsel to contact me if they wanted to discuss the dispute. Attached as Exhibit 2 is a true and correct copy of the letter that was mailed and emailed to plaintiffs' counsel.

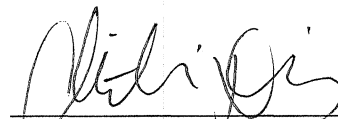
5. Having received no response from plaintiffs, I sent an email to counsel on June 17, 2015, requesting a telephone conference that same day in order to informally resolve this discovery dispute. Attached as Exhibit 3 is a true and correct copy of my email correspondence.

6. Again receiving no response from plaintiffs, I sent a third email to counsel on June 18, 2015, informing counsel that I would be forced to file a motion to compel if I did not hear from them. Attached as Exhibit 4 is a true and correct copy of my third email correspondence.

1 7. To date, neither I nor anyone in my office has received any
2 communication from plaintiffs' counsel regarding this discovery dispute.

3 8. I spent over five hours researching and preparing this motion, including
4 the supporting declaration and exhibits. I expect to spend, at a minimum, an
5 additional two hours in connection with preparing a reply brief and one hour
6 handling the hearing on this matter. My billing rate is \$370.00 per hour.

7
8 I declare under penalty of perjury of the laws of the United States that the
9 foregoing is true and correct; executed June 19, 2015 at San Diego, CA.

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12 Christina Ding